

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

<b>TINA MOORE, et al.,</b>	)	
	)	
<b>Plaintiffs,</b>	)	<b>Case Nos.    4:14-CV-1443 SNLJ</b>
	)	<b>4:14-CV-1447 SNLJ</b>
<b>v.</b>	)	<b>(Consolidated)</b>
	)	
<b>CITY OF FERGUSON, et al.,</b>	)	
	)	
<b>Defendants.</b>	)	

**MOTION FOR LEAVE TO FILE EXHIBITS TO PETITION  
FOR APPROVAL OF WRONGFUL DEATH SETTLEMENT UNDER SEAL**

COME NOW Plaintiffs Tina Moore, Delores Moore and Renee Rodgers for minor ADR (“Plaintiffs”), and for Plaintiffs’ Motion for Leave to File Exhibits to Plaintiffs’ Petition for Approval of Wrongful Death Settlement Under Seal, state as follows:

1. Exhibits 1 through 5 to Plaintiffs’ Petition for Approval of Wrongful Death Settlement contain a Confidential Settlement Agreement, Satisfaction, and Release and Affidavits from each Plaintiff regarding the confidential settlement.

2. Plaintiffs wish to file Exhibits 1 through 5 under seal pursuant to Local Rules 83-13.05(A)(1) in this case when the substantial benefits of the settlement are balanced against the harm of sealing the documents from public view, and the interests of justice weigh in favor of allowing them to remain filed under seal. See *Williams v. BPV Mkt. Place Inv’rs, L.L.C.*, No. 4:14-CV-1047 CAS, 2014 WL 5017934, at \*2 (E.D. Mo. Oct. 7, 2014).

3. For good cause shown, Plaintiffs respectfully request Exhibits 1 through 5 to Plaintiffs’ Petition for Approval of Wrongful Death Settlement be returned to Plaintiffs or remain sealed, as opposed to being made public, at the conclusion of the litigation.

WHEREFORE, the Plaintiffs respectfully pray that this Court allow Plaintiffs to file Exhibits 1 through 5 to Plaintiffs' Petition for Approval of Wrongful Death Settlement under seal and that the documents be returned to Plaintiffs or remain sealed at the conclusion of litigation as opposed to being placed in the public file, and for such further relief as this Court deems just and proper.

Respectfully submitted,

DOWD & DOWD, P.C.

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Delores Moore And Renee Rodgers,  
As Next Friend Of A.D.R, A Minor*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the above pleading was served via the Court's electronic filing system this 31<sup>st</sup> day of January, 2017 to all counsel of record.

/s/ William T. Dowd